

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MEGAN VILLELLA, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

-against-

CHEMICAL AND MINING COMPANY  
OF CHILE, INC., ET AL.,

Defendant.

Civil Action No. 1:15-cv-02106-ER

**STIPULATION AND ORDER SETTING SCHEDULE FOR LEAD  
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

WHEREAS, on June 8, 2017, the Court entered an Order (the “Scheduling Order”) requiring Plaintiff, the Council of the Borough of South Tyneside, Acting in Its Capacity as the Administering Authority of the Tyne and Wear Pension Fund, to file a motion for class certification in the above-captioned action no later than January 10, 2018;

WHEREAS, the Scheduling Order did not set any other deadlines in connection with class certification proceedings;

WHEREAS, on January 10, 2018, Plaintiff served and filed its motion for class certification (the “Class Certification Motion”);

WHEREAS, Defendant Chemical and Mining Company of Chile, Inc. (a/k/a Sociedad Química y Minera de Chile S.A. (“SQM”) believes that ninety days from the date of Plaintiff’s filing of the Class Certification Motion is appropriate to file an opposition and conduct related discovery;

WHEREAS, Plaintiff believes that forty-five days is appropriate to file an opposition, and forty-five days is appropriate to file a reply;

WHEREAS, Plaintiff and SQM, through their respective counsel, have agreed upon a briefing and discovery schedule in connection with the Class Certification Motion;

Accordingly, IT IS HEREBY STIPULATED AND AGREED by the parties, through their undersigned counsel, subject to Court approval, as follows:

1. SQM shall serve and file its opposition to the Class Certification Motion no later than March 30, 2018; and
2. Plaintiff shall serve and file its reply in further support of the Class Certification Motion no later than June 1, 2018.
3. The above deadlines depend upon timely completion of discovery in connection with the Class Certification Motion. The parties reserve their right to seek an extension of the above deadlines due to any discovery delays or for any other reason.

Dated: January 24, 2018

ROBBINS GELLER RUDMAN & DOWD LLP  
Aelish M. Baig  
Matthew S. Melamed  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: (415) 288-4545  
*Lead Counsel for Plaintiff*

By:

*Aelish Baig /msm*  
Aelish M. Baig

MILBANK, TWEED, HADLEY & McCLOY, LLP  
Scott A. Edelman  
Grant R. Mainland  
28 Liberty Street  
New York, NY 10005  
(212) 530-5000  
*Attorneys for Defendant Chemical and Mining Company of Chile, Inc.*

By:

*Grant R Mainland /AMR*  
Grant R. Mainland

**SO ORDERED.**

*E.R.D.*  
Hon. Edgardo Ramos  
United States District Judge  
Dated: 1/25/2018  
New York, New York